HC

ROBERT L. BROWN III

ATTORNEY AT LAW
1005 SOUTH MAIN STREET
CORBIN, KENTUCKY 40701

(606) 528-3073 FAX (606) 528-3289 December 14, 2005

RECEIVED

DEC 1'5 2005

PUBLIC SERVICE

COMMISSION

Public Service Commission Ms. Beth O'Donnell Executive Director 211 Sower Blvd. P.O. Box 615 Frankfort, KY 40602

RE: NOTICE OF GAS COST ADJUSTMENT FILING OF CITIPOWER, LLC. CASE NUMBER 2005-00319

Dear Ms. O'Donnell:

Enclosed please find an original and ten copies of a Motion for Extension of Time as it relates to the above-mentioned matter. Please file the same at your earliest convenience.

Should you have any questions concerning this matter, please do not hesitate to contact me.

Sincerely,

Robert L. Brown III

RLB/ca

Enclosures

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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DEC 1 5 2005

PUBLIC SERVICE
COMMISSION

NOTICE OF GAS COST ADJUSTMENT FILING OF CITIPOWER, LLC.

CASE NO. 2005-00319

MOTION FOR AN EXTENSION OF TIME

Comes the now the undersigned attorney, Robert L. Brown III, and hereby respectfully requests an extension of time to address the issues raised in the Public Service Commission Staff's Second Data Request of Commission Staff to Citipower, LLC. The undersigned attorney would state that due to the schedule of said attorney this firm has not had adequate time to compile the necessary information to adequately respond to the Commission's request, and further, with the holidays so near, the same will prevent Citipower from compiling the requested documentation before the end of the year. For the above stated reasons, the undersigned is requesting an extension of time within which to reply to the Commission's request until January 16, 2006.

Respectfully Submitted,

Robert L. Brown III

1005 South Main Street, Suite 101

Corbin, Kentucky 40701 Telephone: (606) 528-3073

CERTIFICATE OF SERVICE:

I hereby certify that the foregoing Motion was served by faxing a copy and by and mailing the original and ten copies thereof, postage prepaid, this $\cancel{1}\cancel{}$ day of December, 2005, to the following:

Ms. Beth O'Donnell Executive Director Public Service Commission 211 Sower Blvd. P.O. Box 615 Frankfort, KY 40602

Hon. Gregory D. Stumbo Attorney General 1024 Capital Center Drive Suite 200 Frankfort, Kentucky 40602

Robert L. Brown III